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17 Counsel for Plaintiff

18 UNITED STATES DISTRICT COURT  
19 CENTRAL DISTRICT OF CALIFORNIA

20 POVILAS KARCAUSKAS,  
21 on behalf of himself and all  
22 others similarly situated,

23 Plaintiff,

24 vs.

25 REGRESO FINANCIAL  
26 SERVICES LLC;  
27 GOLDSMITH & HULL, APC;  
28 WILLIAM I. GOLDSMITH;

Defendants.

Case No. 2:15-cv-09225-FMO-RAOx

DISCOVERY MATTER:  
NOTICE OF MOTION AND MOTION TO  
COMPEL FURTHER RESPONSES AND  
DOCUMENT PRODUCTION FROM  
WILLIAM I. GOLDSMITH TO (1)  
INTERROGATORIES; (2) REQUESTS  
FOR ADMISSION; AND (3) REQUESTS  
FOR PRODUCTION OF DOCUMENTS

Date: October 26, 2016

Time: 10:00 a.m.

Judicial Ofcr: Rozella A. Oliver, M.J.

Courtroom F, Room 901

Los Angeles Federal Courthouse

312 N. Spring St., 9<sup>th</sup> Floor

Discovery Cutoff Date: 12/07/2016

Class Cert. Motion Deadline: 04/20/2017

Pretrial Conference & Trial Date: Not set.

[Filed concurrently with Joint Stipulation]

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1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on the date and time noted in the caption above,  
3 or as soon thereafter as the matter may be heard, in Courtroom F, Room 901, of this  
4 Court, inside the Los Angeles Federal Courthouse, addressed at 312 N. Spring Street,  
5 Los Angeles, CA 90012, the plaintiff will move for an order to compel WILLIAM I.  
6 GOLDSMITH ["responding party"] to comply with Plaintiff's written discovery  
7 requests consisting of: (1) interrogatories, (2) requests for admission, and (3) requests  
8 for production of documents.

9 Plaintiff also seeks an award of attorney's fees, pursuant to rule 37(a)(5) of the  
10 Federal Rules of Civil Procedure, against the responding party and its counsel.

11 The application will be made pursuant to rule 37 of the Federal Rules of Civil  
12 Procedure and Local Rule 37 et seq.

13 The application will be based on this notice, on the concurrently filed Joint  
14 Stipulation, including concurrently filed exhibits, on the supplemental brief which  
15 Plaintiff intends to file, and on such evidence as may be filed or presented at any  
16 hearings on the matter, including supplemental declarations if the court determines  
17 to award expenses and attorney's fees against the responding party and/or its counsel.

18  
19 Dated: October 5, 2016

20 HORWITZ, HORWITZ & ASSOC.

21 CONSUMER LAW OFFICE OF  
22 ROBERT STEMLER, APC

23 /s/  
24 By: Robert Stempler,  
25 Co-Counsel for Plaintiff and  
26 Moving/Requesting Party  
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